June 15, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: MM Docket No. 99-325

Dear Ms. Dortch:

On behalf of the University of South Florida, licensee of WUSF-FM, Tampa, I am writing in response to the Federal Communications Commission's Further Notice of Proposed Rulemaking in this proceeding. WUSF-FM is a Class C FM station broadcasting at 89.7 MHz. On February 14, 2003 WUSF-FM commenced digital broadcasts using iBiquity Digital Corporation's HD Radio™ system. WUSF-FM is pleased to have had the opportunity to be the first public radio station to implement the HD Radio system in the country.

WUSF-FM strongly supports the FCC's efforts to promote the adoption of digital radio and to develop final rules for digital service. Although the existing interim rules for digital broadcasts have allowed pioneering stations such as WUSF-FM to commence service, the rollout of HD Radio is sufficiently advanced to warrant a prompt implementation of permanent IBOC rules. The University of South Florida has been very pleased with its HD Radio experience. WUSF did not encounter any significant problems with the digital conversion and has been satisfied with the ease of implementation of the HD Radio system. The quality and reliability of the digital signal will bring significant benefits to WUSF-FM's listeners. In our 17 months of operation, we have not encountered any interference problems or listener complaints relating to our digital broadcasts.

WUSF-FM encourages the FCC to take several steps in this proceeding to foster the digital conversion for radio. This station supports the FCC's proposal to adopt final technical and operational rules for the digital service. The designation of IBOC service as a permanent authorization rather than an interim service will provide greater regulatory certainty for broadcasters and equipment manufacturers and encourage adoption of digital technology.

The Commission also should promote policies that provide broadcasters and receiver manufacturers with the flexibility necessary to fully realize the benefits of HD Radio technology. The Commission's rules on digital service should not impose greater burdens on the digital broadcast than currently exist for analog broadcasts. An overly

regulatory approach will discourage widespread adoption of the technology. The test results presented to the broadcast industry over the past several years have demonstrated that IBOC presents little risk of widespread interference to existing analog broadcasts. WUSF-FM's experience has confirmed IBOC's ability to operate efficiently and without interference. In this environment there is no need for the FCC to unduly burden the digital broadcast with detailed regulations.

The FCC recently authorized FM stations operating digitally to use a separate antenna implementation for their digital signal. WUSF-FM encourages the Commission to write its final IBOC rules to permanently provide broadcasters flexibility to implement IBOC in the most effective manner available for each station. The Commission should use its existing equipment certification procedures to regulate the broadcast equipment used for digital broadcasts but should not burden the radio industry with a requirement that every innovation in HD Radio implementation receive prior Commission authorization. It is likely that the first several years of station implementations will see many innovations and improvements in digital operations. All stations that are able to take advantage of these innovations should have that opportunity without the need for Commission authorization on a station by station basis.

The Commission's Further Notice asks questions about new datacasting and multicasting services that can be introduced using HD Radio technology. The University of South Florida supports the development of FCC rules to provide broadcasters great latitude in the introduction of new audio and data services. Broadcasters should be authorized to use scaling of the audio codec and the system's extended hybrid mode to introduce new audio and data services that can co-exist with a station's main program audio service. The station believes the use of supplemental audio is integral to our public service mission and enables us to expand programming to meet listener needs that are either underserved or not served at all. Over regulation of this technology at the early stage of its implementation will stifle the development of innovative services that will benefit listeners.

Our public radio station strives to provide quality, in-depth programming to listeners in our area. Multiplexing of the digital audio signal enables us to provide programs to specific audiences that currently are not served. In its simplest form, this could mean providing our main programming on the primary channel, and an additional service such as music programming on the supplemental channel. In some instances, language-specific programs serving populations of non-English speaking citizens might also be provided.

Current analog radio technology limits our radio station to providing only one programming service to our community. Digital broadcasting, with multicasting capabilities, will enable our radio station to use existing programs in expanded fashion and to develop new, more varied and diverse programming formats whose appeal may be more targeted and defined.

Another exciting aspect of the supplemental audio channel capability is its tremendous cost effectiveness. It presents enormous efficiencies compared to the difficulty and cost associated with acquiring additional frequencies. The resource savings that digital audio multiplexing will afford can be directed into programming that expands services.

Public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission. Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology for remunerative purposes will strengthen our ability to continue to serve the public better into the future.

The University of South Florida is opposed to fees for broadcaster datacasting or multicasting services, even if offered on a subscription basis. Unlike the situation for the digital television conversion, the FCC has not allocated additional spectrum for radio broadcasters to accommodate the new digital signal. In the case of digital television, Congress and the FCC justified imposing fees on new services offered in conjunction with the digital television signal based on the allocation of additional spectrum for each broadcast. In the case of radio, where there has been no new spectrum, the FCC should not impose fees on ancillary services that are supported by the HD Radio system. The FCC currently authorizes subsidiary communication services that operate with existing analog FM without charging broadcasters for the opportunity to offer these services. There are no fees imposed even for subscription SCA services. The datacasting and multicasting features of the HD Radio system are digital upgrades to existing SCA services and should not give rise to a new class of fees that would unfairly burden the digital service for offerings that are analogous to current analog services.

The University of South Florida appreciates the opportunity to offer its views on the Commission’s proposals and encourages the FCC to expedite its completion of its IBOC rules.

Respectfully submitted,

JoAnn Urofsky
General Manager